

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER E. (ALEX) JONES, et al.,

Defendants.

No. 3:18-cv-00017-NKM-JCH

STIPULATION AND ORDER

WHEREAS, Plaintiff Brennan Gilmore (“Gilmore”) sued Defendants Alexander E. Jones (“Jones”), Infowars, LLC (“Infowars”) and Free Speech Systems, LLC (“FSS” and, collectively with Jones and Infowars, the “Defendants”) for defamation in connection with the Defendants’ publication of “*Bombshell Connection Between Charlottesville, Soros, CIA*” on August 15, 2017 and “*Breaking: State Department/CIA Orchestrated Charlottesville Tragedy*” on August 21, 2017 (the “Publications”);

WHEREAS, the Publications contained language pertaining to Gilmore and the August 2017 Unite the Right rally;

WHEREAS, the Defendants had no evidence that Gilmore was involved in a set up or in any other way with the August 2017 Unite the Right rally in Charlottesville and the terrorist attack that killed Heather Heyer;

WHEREAS, Jones, Infowars, and FSS do not contest Gilmore’s allegation of defamation;

WHEREAS, Jones, Infowars, and FSS admit that the publication of “*Bombshell Connection Between Charlottesville, Soros, CIA*” on August 15, 2017 and “*Breaking: State*

Department / CIA Orchestrated Charlottesville Tragedy” on August 21, 2017 did not meet the journalistic standards of Jones, Infowars and FSS;

WHEREAS, on behalf of Infowars and FSS, Alex Jones regrets those publications and their defamatory characterization of Mr. Gilmore, and agrees to retract them;

WHEREAS, the parties desire to amicably resolve all claims arising out of this action;

WHEREAS, Jones, Infowars and FSS agree to pay an agreed-upon sum of damages to Mr. Gilmore in the amount of \$50,000, which shall be the sum total of all damages to be assessed in this litigation against these Defendants;

WHEREAS, Gilmore, Jones, Infowars and FSS, having entered into a settlement agreement, hereby stipulate as set forth below to the entry of an order in this action:

IT IS ORDERED, ADJUDGED, AND DECREED as follows:

1. This Court has jurisdiction over the subject matter of the above action and has personal jurisdiction over the parties for purposes of this action and as set forth in Paragraph 6 below.

2. Jones admits liability for the claims asserted by Gilmore in this action.

3. Infowars admits liability for the claims asserted by Gilmore in this action.

4. FSS admits liability for the claims asserted by Gilmore in this action.

5. As a condition of settlement, Jones, Infowars and FSS have agreed to pay Mr. Gilmore the sum of \$50,000.00, which amount shall be the total of all damages to be assessed in this litigation against these Defendants;

6. Gilmore, Jones, Infowars, and FSS agree that this Court will retain jurisdiction to enforce the terms of the parties’ settlement agreement and to enforce and resolve any disputes related thereto, if necessary.

7. This action and all defenses thereto with respect to Gilmore, Jones, Infowars, and FSS are hereby dismissed with prejudice and without costs, disbursements, or attorneys' fees to any party.

/s/ Hassen A. Sayeed

Jonathan Hacker, admitted *pro hac vice*
D. Sean Trainor, (VSB #43260)
Anwar L. Graves, admitted *pro hac vice*
Rahul Kohli, admitted *pro hac vice*
Kendall Collins, admitted *pro hac vice*
O'MELVENY & MYERS LLP
1625 Eye Street, N.W.
Washington, D.C. 20006
Telephone: (202) 383-5300
Facsimile: (202) 383-5414
jhacker@omm.com
dstrainor@omm.com
agraves@omm.com
rkohli@omm.com
kcollins@omm.com

Hassen A. Sayeed, admitted *pro hac vice*
Chani C. Gatto-Bradshaw, admitted *pro hac vice*
James Yi Li, admitted *pro hac vice*
O'MELVENY & MYERS LLP
Times Square Tower
7 Times Square
New York, New York 10036
Telephone: (212) 326-2000
Facsimile: (212) 326-2061
hsayeed@omm.com
cgatto-bradshaw@omm.com
jli@omm.com

Kimya Saied, admitted *pro hac vice*
O'MELVENY & MYERS LLP
Two Embarcadero Center
28th Floor
San Francisco, CA 94111-3823
Telephone: (415) 984-8700
Facsimile: (415) 984-8701

/s/ Marc J. Randazza

Marc J. Randazza, admitted *pro hac vice*
Randazza Legal Group
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
Telephone: 702.420.2001
mjr@randazza.com

Thomas E. Albro (VSB #12812)
Evan D. Mayo (VSB #89383)
TREMBLAY & SMITH, PLLC
105-109 E. High Street
Charlottesville, VA 22902
Telephone: (434) 977-4455
Facsimile: (434) 979-1221
tom.albro@tremblaysmith.com
evan.mayo@tremblaysmith.com

Counsel for Defendants Alexander E. Jones, Infowars, LLC, Free Speech Systems, LLC

ksaied@omm.com

Aderson Francois, admitted *pro hac vice*
CIVIL RIGHTS CLINIC
GEORGETOWN UNIVERSITY LAW
CENTER
600 New Jersey Avenue, N.W.
Washington, D.C. 20001
Telephone: (202) 662-9065
Aderson.Francois@georgetown.edu

Elizabeth B. Wydra, admitted *pro hac vice*
Brienne J. Gorod, admitted *pro hac vice*
CONSTITUTIONAL ACCOUNTABILITY
CENTER
1200 18th Street, N.W., Suite 501
Washington, D.C. 20036
Telephone: (202) 296-6889
elizabeth@theusconstitution.org
brienne@theusconstitution.org

Attorneys for Plaintiff

SO ORDERED this 11th day of April, 2022.



NORMAN K. MOON
SENIOR UNITED STATES DISTRICT JUDGE